

May 30, 2025

VIA ECF

Hon. Victoria Reznik
United States Magistrate Judge
United States District Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Graham et al v. Vassar College*, No. 7:23-cv-07692

Dear Judge Reznik:

The parties submit this joint status letter pursuant to the Court's Order, dated April 22, 2025 (ECF No. 72).

Discovery. As set forth in the parties' prior joint status letters, Plaintiffs and Defendant both served and responded to one another's written document requests and interrogatories, and the parties also exchanged initial disclosures. The parties continue to meet and confer regarding any unresolved items from those responses, with the understanding that some items are necessarily part of the parties' negotiations related to ESI, as further discussed below.

Plaintiffs' counsel continues to actively work with each of the named plaintiffs to gather all responsive documents. Defendant's counsel similarly continues to actively work with Vassar to gather responsive documents. Going forward, both parties plan to continue rolling productions of documents that have been manually collected from their clients. In particular, Defendant anticipates making another production within the week and will continue rolling productions thereafter.

The parties are also continuing to negotiate the parameters for ESI collection, pursuant to the ESI Protocol. The parties have exchanged initial search term and custodian proposals and counter-proposals, and are working collaboratively toward an agreement on search terms and custodians, keeping in mind overall proportionality concerns with respect to the volume of data to be reviewed. The parties are continuing to develop a timeline for the substantial completion of ESI productions.

The parties have begun to discuss the scheduling of depositions. The parties are also meeting and conferring regarding the schedule for exchanging discovery in advance of the class certification motion and will promptly submit a proposal for the Court's consideration.

Settlement. There have been no discussions of settlement since the parties' October 10, 2024 case management statement. See ECF No. 58 at 2.

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